

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

YASEEN TRAYNOR, on behalf of himself and  
all others similarly situated,

Plaintiffs,

v.

THE GOULET PEN COMPANY, LLC,

Defendant.

Civil Action No. 1:19cv02698-PAE-HBP

**CONSENT MOTION FOR ENTRY  
OF INJUNCTION AND FINAL  
JUDGMENT**

**CONSENT MOTION FOR ENTRY OF  
ORDER OF PRELIMINARY INJUNCTION**

Plaintiff Yaseen Traynor (“Plaintiff” or “Traynor”) and Defendant The Goulet Pen Company, LLC (“Goulet Pen”), by and through their counsel, submit for consideration an Order of Injunction and Final Judgment. Counsel for the parties have reviewed the language of the proposed Order of Injunction and Final Judgment and have no objection to the Court’s entry of the attached Order. The parties do not request a hearing on this Motion.

WHEREFORE, Traynor and Goulet Pen request that the Court enter the Order of Injunction and Final Judgment attached hereto.

Respectfully submitted,

YASEEN TRAYNOR  
  
By: /s/ Yaakov Saks  
Yaakov Saks  
STEIN SAKS, PLLC  
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Hackensack, NJ 07601

THE GOULET PEN COMPANY, LLC  
  
By: /s/ Christina H. Bost Seaton  
Christina H. Bost Seaton  
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all others similarly situated,

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**ORDER OF INJUNCTION AND  
FINAL JUDGMENT**

THIS MATTER is before the Court on the parties' joint motion for entry of an Injunction and Final Judgment as contained herein. This action was commenced by the filing of Plaintiff Yaseen Traynor's Complaint on March 26, 2019 (the "Action"), arising out of Defendant's operation of its website gouletpens.com (the "Website").

It appears to the Court that the parties have resolved the matters that were the subject of the Action and consent to the entry of this Consent Injunction and Final Judgment (the "Consent Injunction"). Accordingly, the Court hereby ORDERS as follows:

1. This Consent Injunction and Final Judgment shall issue immediately.
2. The Defendant shall maintain the Website in compliance with Web Content Accessibility Guidelines (WCAG) 2.0. Defendant may maintain its current procedure of scanning the Website every two (2) weeks to ensure compliance with WCAG 2.0.
3. In the event Plaintiff contends the Website is not in compliance with WCAG 2.0, then, provided the condition on which Plaintiff bases this contention is not cured within two (2)

weeks after Plaintiff's discovery of the condition, then Plaintiff shall notify Defendant in writing that it contends the Website to be out of compliance with WCAG 2.0, and the basis for such contention. Defendant shall ensure the Website's compliance with WCAG 2.0 within thirty (30) days after receipt of any such notice.

4. The Court shall retain jurisdiction over both this matter and the parties for the purposes of enforcing this Consent Injunction. Each party irrevocably waives any objection to personal jurisdiction over it in this Court.

5. Each party irrevocably waives any appeal from entry of this Consent Injunction.

6. The parties intend this Consent Injunction to be the final order disposing of all issues in this action, except as additional orders or rulings may be necessary to enforce this Consent Injunction.

7. Accordingly, all claims raised in this Action, are hereby Dismissed with Prejudice, with each party to bear its own attorney fees and costs, unless separately agreed in writing between the parties.

SO ORDERED, this the \_\_\_\_\_ the day of \_\_\_\_\_, 2019.

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The Honorable Paul A. Engelmayer